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Filed 06/01/20

Page 1 of 6 Page ID

Case 8:18-cv-01328-JVS-DFM Document 32

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## ADDITIONAL COUNSEL FOR PLAINTIFF: ROGER CARTER (SBN 140196) BIANCA A. SOFONIO (SBN 179520) THE CARTER LAW FIRM 23 CORPORATE PLAZA DRIVE, SUITE 150 NEWPORT BEACH CA 92660 TELEPHONE: (949) 245-7500 EMAIL: RCARTER@CARTERLAWFIRM.NET; BIANCA@CARTERLAWFIRM.NET MARC H. PHELPS (SBN 237036) THE PHELPS LAW GROUP 23 CORPORATE PLAZA DRIVE, SUITE 150 Newport Beach CA 92660 Telephone No. (949) 629-2533 FACSIMILE No. (949) 629-2501 EMAIL: MARC@PHELPSLAWGROUP.COM -2-

**SETTLEMENT** 

### TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

NOTICE IS HEREBY GIVEN that, on June 29, 2020, at 1:30 p.m. in the United States District Court, Central District of California, Santa Ana Division located at 411 West 4th Street, Santa Ana, California 92701-4516, in Courtroom 10C, before the Honorable James V. Selna, Plaintiff DANIEL JORDAN ("Plaintiff"), on behalf of himself and other similarly situated non-exempt California employees of Defendants MICHAEL PAGE INTERNATIONAL, INC., a Delaware Corporation; C&D ZODIAC, INC. dba ZODIAC AEROSPACE, a Delaware Corporation (collectively known as ("MPI") will and hereby does move this Court for final approval of the parties' Settlement Agreement and requesting entry of an order certifying the collective class action claims under Rule 23 of the Federal Rules of Civil Procedure.

The basis for this Motion is that the proposed settlement is fair, adequate, and reasonable and in the best interests of the Class as a whole, and the procedures proposed by the parties are adequate to ensure the opportunity of class members to participate in, opt out of, or object to the settlement. The Court has already preliminarily approved the Settlement, and the Settlement Administration has been completed successfully and provides reasonable compensation to Plaintiff and the Class Members for their claims against Defendants.

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This Motion is based upon this Notice, the Memorandum of Points and Authorities, the Declaration of Class Counsel, Richard E. Quintilone II, Esq., Roger R. Carter and Marc Phelps, the Declaration of Class Representative, Daniel Jordan, and Claims Administrator, McKenna Snow, filed herewith, the previously filed motion for preliminary approval documents, including the Stipulation of Resolution ("Settlement Agreement") *Docket No.* 27, attachment #2 Exh. A, and other exhibits filed therewith, all other pleadings and records on file in this action, and the presentations of counsel.

Dated: June 1, 2020 QUINTILONE & ASSOCIATES

By:

RICHARD E. QUINTILONE II, LAUREL N. HOLMES, ALEJANDRO QUINONES Attorney for Plaintiff DANIEL JORDAN, on behalf of himself and on behalf of a Class of all other persons similarly situated

Soli B.

#### **PROOF OF SERVICE**

I, the undersigned, declare as follows:

I am a citizen of the United States, over the age of 18 years, and not a party to the within action. I am an employee of or agent for Quintilone & Associates, whose business address is 22974 El Toro Rd., Suite 100, Lake Forest, CA 92630-4961.

On **the date below**, I served the foregoing document(s):

# PLAINTIFF'S NOTICE OF MOTION AND UNOPPOSED MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT

on the following parties in this action addressed as follows:

#### SEE ATTACHED SERVICE LIST

	(BY MAIL) I caused a true copy of each document, placed in a sealed envelope with postage fully paid, to be placed in the United States mail at Lake Forest, California. I am "readily familiar" with this firm's business practice for collection and processing of mail, that in the ordinary course of business said document(s) would be deposited with the U.S. Postal Service on that same day. I understand that the service shall be presumed invalid if the postal cancellation date or postage meter date on the envelope is more than one day after the date of deposit for mailing contained on this affidavit.
	(BY PERSONAL SERVICE) I delivered each such document by hand to each addressee above.
	(BY OVERNIGHT DELIVERY) I caused a true copy of each document, placed in a sealed envelope with delivery fees provided for, to be deposited in a box regularly maintained by Federal Express or Overnight Express. I am readily familiar with this firm's practice for collection and processing of documents for overnight delivery and know that in the ordinary course of Quintilone & Associates' business practice the document(s) described above will be deposited in a box or other facility regularly maintained by Federal Express or Overnight Express or delivered to a courier or driver authorized by Federal Express or Overnight Express to receive documents on the same date it is placed at Quintilone & Associates for collection.
	(BY FACSIMILE) By use of facsimile machine number 949.458.9679, I served a copy of the within document(s) on the above interested parties at the facsimile numbers listed above. The transmission was reported as complete and without error. The transmission report was properly issued by the transmitting facsimile machine.
X	(BY ELECTRONIC SERVICE) I delivered each such document by electronic means pursuant to California Civil Code, Code of Civil Procedure, the Local Rules and/or FRCP § 5(b)(2), et seq.
Executed on <b>June 1, 2020</b> at Lake Forest, California.	
x	(FEDERAL) I declare under penalty of perjury that the above is true and correct.
	(STATE) I declare under penalty of perjury that the above is true and correct.
	Ame

ALEJANDRO QUINONES, ESQ.

PROOF OF SERVICE

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Filed 06/01/20 Page 6 of 6 Page ID

Case 8:18-cv-01328-JVS-DFM Document 32